

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**CELINA GARDENHIRE,**

**Plaintiff,**

**CASE NO.: 1:17-CV-01955**

**v.**

**JUDGE SOLOMON OLIVER, JR.**

**OHIO DEPARTMENT OF  
REHABILITATION & CORRECTION,**

**Defendant.**

**JOINT MOTION FOR EXTENDING THE DISCOVERY DEADLINE AND FOR  
EXTENDING THE DATE FOR FILING MOTIONS FOR SUMMARY JUDGMENT**

Plaintiff Celina Gardenhire and Defendant Ohio Department of Rehabilitation and Correction, pending this Court's leave, hereby jointly move to: (1) extend the discovery completion date from September 21, 2018 to November 19, 2018; and (2) extend the deadline for filing motions for summary judgment from October 26, 2018 to December 21, 2018. A Memorandum in Support of this Motion is attached hereto.

Respectfully submitted,

MICHAEL DEWINE (0009181)  
Ohio Attorney General

*/s/ James J. Hux per email authority 9/6/18*

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*Counsel for Defendant*

**MEMORANDUM IN SUPPORT**

Pursuant to this Court's January 19, 2018 Order, (Doc. 10), all discovery was to be completed by September 21, 2018, and the date for filing motions for summary judgment is October 26, 2015.

The parties have recently engaged in a formal mediation in an attempt to resolve this matter and a related administrative appeal before the State Personnel Board of Review, Case No. 17-REM-07-0103. However, to date, the parties have been unsuccessful in reaching a global settlement and have continued to engage in discovery.

The parties are currently in the process of completing paper discovery. Specifically, Defendant's counsel is presently drafting responses to Plaintiff's First Set of Interrogatories and Request for Production of Documents, which includes reviewing and preparing a voluminous amount of documents. At the completion of that process, Defendant intends to depose Plaintiff. In addition, Plaintiff plans to take the depositions of numerous officials at Grafton Correctional Institution. However, the parties are unable to coordinate their schedules to afford sufficient time for these depositions prior to the September 21, 2018 deadline.

This joint request to postpone the discovery completion and dispositive motion filing deadlines will not unduly delay this matter because there is not currently a trial date scheduled. Moreover, this request is the first request that the Parties have made.

Wherefore, for good cause shown and not for the purpose of delay, Plaintiff Celina Gardenhire and Defendant Ohio Department of Rehabilitation and Correction respectfully move this Court to issue an Order extending the discovery deadline to **November 19, 2018** and extending the date for filing motions for summary judgment to **December 21, 2018**.

Respectfully submitted,

MICHAEL DEWINE (0009181)  
Ohio Attorney General

*/s/ James J. Hux per email authority 9/6/18*

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*Counsel for Defendant*

**CERTIFICATE OF SERVICE**

This will certify that the foregoing was filed electronically on September 7, 2018. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

*/s/ Joseph N. Rosenthal*

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